

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARC JANSEN, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

INTERNATIONAL FLAVORS &
FRAGRANCES INC., ANDREAS FIBIG,
AND RICHARD A. O'LEARY,

Defendants.

Case No. 19-cv-07536 (NRB)

STIPULATION AND [PROPOSED] SCHEDULING ORDER

WHEREAS on August 12, 2019, Plaintiff Marc Jansen ("Plaintiff") filed the complaint in this action ("Initial Complaint") against Defendants International Flavors & Fragrances Inc., Andreas Fibig and Richard A. O'Leary ("Defendants") (with Plaintiff, the "Parties");

WHEREAS, the claims asserted in the Initial Complaint in this action are governed by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), 15 U.S.C. § 78u-4, which provides a procedure for the appointment of lead plaintiff(s) and lead counsel to represent the putative class by the Court;

WHEREAS, Defendant International Flavors & Fragrances Inc. was served with the summons and Initial Complaint on August 23, 2019;

WHEREAS, after appointment of lead plaintiff and approval of lead counsel, the Parties anticipate that lead plaintiff will file an amended complaint;

WHEREAS, counsel for the Parties believe that an answer or motion responding to the Initial Complaint would be premature prior to the entry of an Order by the Court pursuant

to the PSLRA appointing one or more lead plaintiffs and lead counsel; and

WHEREAS motions for the appointment of lead plaintiff(s) and lead counsel are due October 11, 2019.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, through their undersigned counsel, subject to approval by the Court, as follows:

1. Counsel for defendant International Flavors & Fragrances Inc. shall accept service for the individual defendants Andreas Fibig and Richard A. O'Leary.
2. Defendants shall not be required to answer or otherwise respond to the Initial Complaint, and hereby are expressly relieved from answering or otherwise responding to the Initial Complaint.
3. Within ten (10) days of the entry of an Order appointing lead plaintiff(s) and lead counsel in the above-captioned action (or a consolidated action encompassing the above-captioned action) pursuant to the PSLRA, the Parties will confer and submit a proposed schedule, subject to the approval of the Court, for the filing of an amended complaint and Defendants' response thereto.
4. There have been no requests for an extension of time previously made in this matter.
5. Nothing in this stipulation shall be construed as a waiver of any defenses or rights available to parties (other than with respect to service of process).
6. This stipulation may be signed in counterparts.

Dated: September 12, 2019
New York, New York

Respectfully submitted,

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Attorneys for Plaintiff Marc Jansen

SO ORDERED:

Hon. Naomi Reice Buchwald
United States District Judge
__ Day of ____, 2019